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Public Comments on Aviation Communications:=====

Title: Aviation Communications

FR Document Number: 2013-01871

Legacy Document ID:

RIN:

Publish Date: 1/30/2013 12:00:00 AM

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Comment: I am strongly opposed to any proposal to prohibit the sale and use of 121.5 mhz Emergency Locator Transmitters (ELT). The 121.5 ELT in my two-seat Cessna 152 has worked fine for the ten years I have owned the plane. I see no need to replace it. If I did, I already own another one of the same model that I can install.

The most economical 406 mhz ELT for replacing my current ELT costs \$600, not including the cost of a GPS to enable it to give a position location. Without the position information, there is little value to having a 406 ELT. I do not know how much it would cost to provide a GPS signal to the ELT, but it would be substantial.

I expect the cost to me of a ruling to prohibit 121.5 ELTs to be about \$2000, including the loss of value of two 121.5 ELTs I already own. This is roughly 1/11th the value of my airplane. Also, the batteries for my current ELT cost about \$5.00 per year. The lithium ion battery for the new ELT costs \$20 per year, an increase of 400%. I cannot tell from the proposal, but it appears this 406 ELT might be prohibited because it broadcasts on 121.5 as well as 406.

I already own another device that is capable of transmitting an emergency GPS location signal to a satellite. It is waterproof, it floats, and I can carry it in my person if I have to abandon the aircraft in a ditching in water.

I also know that within seven years I will have to install an ADS-B Out system on the aircraft that will continuously broadcast a position report from a WAAS GPS, currently estimated at about \$7000. ADS-B Out has the potential to render a 406 ELT obsolete. The concept of being forced to pay several thousand dollars for a device that will be obsolete within a few years of its installation is unacceptable.

I question the FCC's motives behind this proposal. It could not be flight safety, because that is under the purview of the FAA, which is not requiring replacement. Why do it?

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